



July 26, 2001

Ms. Magalie R Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Presentation, ET Docket 98-153
Revision of Part 15 of the Federal Communications Commission's Rules
Regarding Ultra-Wideband Devices

Dear Ms. Salas:

The Satellite Communications Division (SCD) of the Telecommunications Industry Association (TIA) has been following with interest the above-mentioned proceeding on Ultra-Wideband (UWB). SCD wishes to express its view that any rules proposed or adopted for governing deployment of UWB devices by the Commission should ensure adequate protection to existing and planned Fixed-Satellite Service (FSS) systems. While SCD favors the deployment of UWB technology in general, we nonetheless support its deployment pursuant to an appropriate technical regulatory framework rather than as unrestricted Part 15 devices.

SCD is particularly concerned with issues raised in NTIA's report¹ concerning FSS Earth stations operating in the 3.7-4.2 GHz range. While no independent testing of commercial satellite communications systems has been done, the NTIA report uses generally accepted sharing criteria and analysis methodologies that are equally applicable to commercial satellite systems. The NTIA report demonstrates a potential for the proposed UWB transmission systems to cause harmful interference into FSS earth stations operating in the 3700-5650 MHz band. Indeed, the NTIA results suggest that UWB operations might have to be constrained with respect to factors such as spectral output power, amount of operating time, and quantity of units operating in any given area, in order to avoid causing interference.² The study also shows that the separation distances between the FSS earth stations and UWB devices needed to limit interference to FSS operations may involve distances of several tens of kilometers for certain interference scenarios and types of UWB signal structures. Absent a method of

¹ NTIA Special Publication 01-43, *Assessment of Compatibility between Ultrawideband Devices and Selected Federal Systems* (January 2001).

² *Id.*, at Section 4.10.

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restricting the aggregate interference from UWB devices in the vicinity of FSS earth stations, one possible regulatory solution is to limit operation of UWB devices to frequencies above the receive frequencies of FSS earth stations.

In light of the concerns expressed above, TIA's SCD urges the Commission to consider the FSS interference issue when discussing possible technical rules and operational requirements for the deployment of UWB devices and adopt a specific technical regulatory framework to govern UWB devices that protects FSS systems from harmful interference.

Sincerely,

By: _____

Dr. Thomas Brackey
Chairman
Satellite Communications Division
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Cc: Chairman Michael K. Powell
Commissioner Gloria Tristani
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
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